

December 14, 2023

Honorable Robert Pitman
United States District Court Western District of Texas
501 West Fifth Street, Suite 5300
Austin, Texas 78701

Re: Joint Letter to the Court Regarding Local Rule 16, Texas Tribune, et al. v. Caldwell County, Texas, et al., No. 1:23-cv-00910-RP

Dear Judge Pitman,

The Parties recognize that the deadline to submit a proposed scheduling order under Local Rule 16(c) fell on December 12, 2023, the same day as the Preliminary Injunction Hearing. In view of the pending Motion for Preliminary Injunction and Motion for Judgment on the Pleadings, the Parties have not so far conducted a Rule 26(f) conference but are prepared to do so expeditiously pending the outcome of the motions or at the Court's direction.

Sincerely,

/s/ Camilla Hsu

Camilla Hsu,
State Bar No. 24130207
Texas Fair Defense Project
314 E. Highland Mall Blvd., Suite 204
Austin, TX 78752
(512) 637-5220 x111
chsu@fairdefense.org
*Counsel for Plaintiffs Mano Amiga
and Caldwell/Hays Examiner*

/s/ Scott Wilkens

Scott Wilkens, *Pro Hac Vice*
Knight First Amendment Institute at
Columbia University
475 Riverside Drive, Suite 302
New York, NY 10115
(646) 745-8500
scott.wilkens@knightcolumbia.org
Counsel for Plaintiffs

/s/ J. Eric Magee

SBN: 24007585
e.magee@allison-bass.com
Susana Naranjo-Padron
SBN: 24105688
s.naranjo-padron@allison-bass.com
ALLISON, BASS & MAGEE, L.L.P.
1301 Nueces Street, Suite 201
Austin, Texas 78701
(512) 482-0701 telephone
(512) 480-0902 facsimile
Counsel for Defendants